

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JANE DOE,)	
)	
Plaintiff,)	CASE NO: 1:24-cv-02778
)	
v.)	Honorable John J. Tharp, Jr.
)	Honorable M. David Weisman
NATHANIEL STEVENSON,)	
)	
Defendant.)	
)	

**PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT OF
DEFENDANT’S VIOLATION OF 15 U.S.C. § 6851**

Pursuant to F.R.C.P. 56(a) and Local Rule 56.1, Plaintiff Jane Doe, by and through her attorneys, respectfully moves this Court for partial summary judgment on Count 1 of her Complaint, for Unlawful Disclosure of Intimate Images in violation of 15 U.S.C. § 6851. In support of this Motion, Plaintiff submits the accompanying Memorandum of Law and Statement of Facts which fully set forth the reasons for the relief requested.

WHEREFORE, Defendants respectfully request that this Court grant their Motion for Partial Summary Judgment that Defendant violated 15 U.S.C. § 6851.

Dated: September 30, 2024

Respectfully submitted,

By: /s/ David A. Bateman
David A. Bateman (pro hac vice)
K&L GATES LLP
925 4th Avenue, Suite 2900
Seattle, WA 98104
Telephone: (206) 370-6682
david.bateman@klgates.com

Kenn Brotman (IL6236771)
Jonah B. Heemstra (IL6339094)
K&L GATES LLP
70 W. Madison St., Suite 3300
Chicago, IL 60602
Telephone: (312) 372-1121
kenn.brotman@klgates.com
jonah.heemstra@klgates.com

Emily Jones (IL6339162)
Chicago Alliance Against Sexual
Exploitation
307 N. Michigan Avenue, Suite 1020
Chicago, IL 60601
Telephone: (773) 244-2230 ext. 210
ejones@caase.org

Attorneys for Plaintiff Jane Doe